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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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November 19, 1997

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Mail Stop Code 1170  
Washington, D.C. 20544

Re: Application of BellSouth Corporation et al for Provision of In-Region, Inter-LATA  
Services in South Carolina, CC Docket No. 97-208

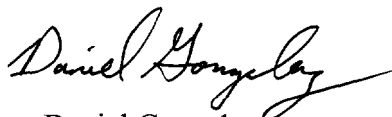
Dear Secretary Salas,

Pursuant to the requirements of Sections 1.1200 et seq. of the Commission's Rules, you are hereby notified that on behalf of Nextlink Communications, Inc., R. Gerard Salemme, Vice-President, External Affairs and Industry Relations and the undersigned met yesterday with Michael Pryor, Michelle Carey, Jordan Goldstein, Rob Tanner, and Audrey Wright of the Policy and Program Planning Division of the Common Carrier Bureau. During the course of the meeting, we discussed Nextlink Communications, Inc. views regarding BellSouth's pending 271 application to provide In-Region, Inter-LATA services in the state of South Carolina.

Enclosed is a summary of the specific issues raised by Nextlink during the course of the meeting.

Should there be any questions regarding this matter, please contact me.

Sincerely,



Daniel Gonzalez  
Director, Regulatory Affairs

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NOV 19 1997

**NEXTLINK's Position on BellSouth's 271 Application for South Carolina** FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

NEXTLINK does not provide telecommunications service in South Carolina, however, it is a facilities-based carrier in BellSouth's service area in Tennessee. NEXTLINK provides local service to customers in Tennessee through the use of both its own network facilities and by obtaining unbundled loops from the incumbent provider, BellSouth.

Given that BellSouth's OSS Systems are provisioned in a similar fashion throughout its region, we believe that NEXTLINK's experience with BellSouth's provision of OSS in Tennessee is directly relevant to the FCC's inquiry into BellSouth's compliance with the statutory requirements of Section 271 in South Carolina. In this ex parte filing, NEXTLINK shares with the Commission its perspective on BellSouth's provision of OSS in Tennessee and its position on BellSouth's 271 Application for South Carolina.

- I. NEXTLINK, requests that the FCC deny BellSouth's Application for In-Region InterLATA authority in South Carolina.
- II. NEXTLINK supports the Department of Justice's (DOJ) finding that BellSouth has failed to demonstrate that it is offering Access and Interconnection that satisfy the Competitive Checklist requirements contained in the Telecommunications Act of 1996.

Operational Support Systems (OSS)

- The FCC should not disregard the findings and opinions of the DOJ, and the majority of state regulatory entities and their staffs (e.g., Alabama, Georgia, and the Florida Public Service Commission staff) that have found BellSouth's OSS systems inadequate in meeting the requirements of Sections 251 and 271.
- The deficiencies of BellSouth's OSS Systems articulated by the commenters in this proceeding are also readily apparent in Tennessee.
- Based on our Tennessee experience, it is clear that BellSouth's OSS Systems are inadequately designed to accommodate the current demand of competing carriers for access to OSS functions.

Pre-ordering

- NEXTLINK uses BellSouth's LENS system for pre-ordering unbundled loops in Tennessee. Our experience with LENS has revealed that LENS is unreliable for pre-ordering functions.

- NEXTLINK personnel have had difficulty entering and staying signed onto the system. Third party security vendor requirements have created long delays for NEXTLINK personnel that access the LENS system.
- NEXTLINK personnel have frequently been "locked-out" of the LENS system and have had to engage in the frustrating and time consuming process of attempting to re-enter the system.
- The summary CSR information provided by LENS for pre-ordering functions has been inadequate and has frequently prevented NEXTLINK from submitting the necessary information to complete a valid service order.
- The LENS does not provide Local Service Itemization (LSI) summary information, although BellSouth makes that information readily available along with the CSR upon a non-electronic request. The LSI provides important USOC and other product information regarding a customer's existing service, information that is vital for placing a valid service order with BellSouth.

The deficiencies in BellSouth's LENS system have slowed the ordering process and caused unnecessary delays in the provisioning of unbundled loops to NEXTLINK and the provision of competitive local service to our customers in Tennessee.

#### Provisioning

- BellSouth appears unable or unwilling to meet its scheduled installation commitments when provisioning unbundled loops. Timely provision of unbundled network elements (UNEs) is critical to the viability of competitive choice in the local exchange market.

BellSouth's track record in provisioning UNEs has been woefully inadequate. For example:

- In Nashville, this past September and October, BellSouth failed to keep its scheduled commitments for nearly 1 out of every 4 unbundled loops ordered by NEXTLINK.
- BellSouth also maintains that it meets its scheduled installation commitment when it misses the scheduled timeframe for connecting an unbundled loop (e.g., 10 am), but still performs the service cut-over on the same calendar day.

- Under this scenario, which occurs frequently, NEXTLINK customers have been disconnected from telephone service from 30 minutes up to an entire day.
- Our business customers find such service disruptions unacceptable because of the vital role of telephone service serves in conducting commerce.
- BellSouth's OSS systems also appear incapable of adapting to slight changes made in installation schedules for unbundled loops.
  - Scheduling changes made on service orders (initiated either by BellSouth or Nextlink) or BellSouth missed due dates appear to wreak havoc on BellSouth's OSS system.
  - BellSouth's internal systems frequently fail to recognize installation scheduling changes - - and thus our customers are frequently disconnected from the network for several hours. (38% of Nextlink service orders in Tennessee experience changed due dates, and it appears that 50% of these orders result in service disruptions)
  - BellSouth is either understaffed or unwilling to help fix this problem. Because manual intervention by BellSouth is necessary - - it usually takes BellSouth 2 hours, after a NEXTLINK service outage report, just to find the source of the problem and then more time is needed to reconnect the NEXTLINK customer's service.

### Service Quality

- In addition to BellSouth's inability to provide unbundled loops in a timely fashion, it also seems unable or unwilling to consistently deliver the same quality of loops that it provisions to itself.
- NEXTLINK estimates that approximately 10% of unbundled loops received from BellSouth in Tennessee experience a degradation in service and are of lesser quality after being unbundled and provisioned to NEXTLINK.
- For example, NEXTLINK technicians routinely measure the milli-amp (power) level of a BellSouth loop prior to the transfer of the loop. Our measurements, before service cut-over, typically reveal a loop powered at a 28-32 milli-amp level.

Yet, BellSouth frequently provisions unbundled loops to NEXTLINK at a much lower power level (20 milli-amps).

- Loops at such degraded power levels (20 milli-amps) make it difficult, at best, to support the trouble-free transmission of data services (fax & modem transmission).
- BellSouth's proposed remedy to NEXTLINK has been to suggest that we should report such incidents in the form of service trouble tickets after service cut over.
- NEXTLINK has brought this problem to BellSouth's attention, however, BellSouth has refused to provide parity by powering such loops at the same milli-amp level that existed before an end-user customer switched service providers.

#### Directory Listings

- BellSouth's OSS system appears incapable of providing, on a timely basis, NEXTLINK customers in Tennessee with a directory listing.
- Many of our customers in Tennessee have experienced delays - - on average - - of between 2 to 5 business days in getting their phone numbers listed in the directory listing.